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Services, Inc., Jerry Mascolo, Leondra Coleman,
and Dawn Cockrum*

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

PATSY JAY,

Plaintiff,

v.

GRAND MANAGEMENT SERVICES, INC.,
EVERGREEN GARDENS LIMITED
PARTNERSHIP, JERRY MASCOLO,
LEONDRA COLEMAN, and DAWN
COCKRUM,

Defendants.

Case No. 3:23-cv-00656-SI

**SECOND STIPULATED MOTION TO
EXTEND DEADLINES**

LR 7-1 CERTIFICATION

The parties have conferred and jointly request the court extend the deadlines set forth in the current scheduling order (ECF 11) for a period of 60-days for the discovery deadline and 75-days for all other deadlines. This is the second request for an extension made by the parties, and the parties make this request upon good cause.

STIPULATED MOTION

On March 21, 2024, during the parties' discovery conference with the Court, the Court agreed to extend the then discovery cut-off date to the current date, June 17, 2024. *See*, Minute Order, ECF No. 18. No other dates were extended at that time. Despite Plaintiff's diligent efforts, the parties will not be able to complete discovery by the current discovery cut-off deadline of June 17, 2024, due to the schedule of Grand Management Service's defendants' counsel and her lack of availability for depositions before June 17, 2024.

Because the discovery cut off falls after the deadline for expert disclosures, extensions are sought for two different time periods: 60-days for the discovery deadline and 75-days for all others. The parties request an extension of the current case schedule as follows:

	Current Deadline	New Deadline
Discovery Cut Off	June 17, 2024	August 16, 2024
Expert Disclosures	June 4, 2024	August 19, 2024
Expert Discovery Cut Off	July 16, 2024	September 30, 2024
Joint ADR Report	August 29, 2024	November 12, 2024
Dispositive Motions	August 29, 2024	November 12, 2024

Good cause exists for the extension. Consistent with the Court's order, the parties met in person on April 9, 2024, to discuss the proposed Protective Order as well as discovery outstanding from the Grand Management Services' defendants. The Stipulated Protective Order was signed on April 17, 2024. (ECF 20). Responsive documents, to the extent such documents exist, were provided to Plaintiff by Defendants throughout late May 2024, with the last delivery on May 22, 2024.

Plaintiff has requested the depositions of several Grand Management employees. The depositions of defendants have been scheduled for June 12 and the remainder on July 9 and 10, 2024. The deposition of plaintiff is scheduled for July 11, 2024.

This extension will give the parties time to complete the discovery necessary, to ensure that their experts have sufficient time to receive and review all relevant materials in preparation of their opinions, to complete expert discovery and to file dispositive motions, if any.

The parties agree that good cause exists for extending the pending deadlines according to the above schedule. This Motion is based on good cause and is not submitted solely for the purposes of delay.

IT IS SO STIPULATED this 5th day of June, 2024.

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